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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION,**

THIS DOCUMENT RELATES TO:

Epic Games, Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

Match Group, LLC et al. v. Google LLC et al.,
Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**[PROPOSED] ORDER RE: GOOGLE'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

Judge: Hon. James Donato

Having considered Google Defendants' ("Google's") Administrative Motion to File Under Seal limited portions of Epic and Match's Reply in support of Epic and Match's Motion to Amend Complaints (MDL Dkt. Nos. 362-64), Epic and Match Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should be Sealed (MDL Dkt. 365), and the Declaration of Christian Cramer ("Cramer Decl.") in support of Google's Administrative Motion, as well as any materials submitted in support or in opposition thereto, pursuant to Local Rules 7-11 and 79-5;

IT IS HEREBY ORDERED:

The following portions of Epic and Match's Reply and supporting documents may be filed under seal:

Item	Portion Containing Designated Information	Designating Party	Ruling
Epic's and Match's Reply iso Motion to Amend Complaints [Dkt. No. 365]	Page 3, lines 27-28 (between "least" and "Project Hug")	Google (Cramer Decl. ¶ 1)	
Epic's and Match's Reply iso Motion to Amend Complaints [Dkt. No. 365]	Page 4, lines 4-7 (between "with developer" and "was made"; between "in order" and "(ECF No. 344-04)"; between "that developer" and "told Google"; and between "told Google that" and "(ECF No. 344-03).")	Google (Cramer Decl. ¶ 2)	
Epic's and Match's Reply iso Motion to Amend Complaints [Dkt. No. 365]	Page 4, line 21 to Page 5, line 5 (between "Ex. D," and "Tr."; between "counsel asking whether" and "236"; and between "counsel asking if" and "; see also")	Google (Cramer Decl. ¶ 3)	
Epic's and Match's Reply iso Motion to Amend Complaints [Dkt. No. 365]	Page 7, line 28 to page 8, line 1 (between "communications showing that" and "and that Google chose to pay")	Google (Cramer Decl. ¶ 4)	

Item	Portion Containing Designated Information	Designating Party	Ruling
Decl. of Michael J. Zaken iso Epic and Match's Reply [Dkt. No. 365-06]	Page 1, line 14 (from "transcript of" to end of sentence)	Google (Cramer Decl. ¶ 5)	
Ex. A to Zaken Decl. [Dkt. No. 365-06] (September 23, 2022 letter from Brian Rocca to Yonatan Even)	Page 1-2 (entire table after first row listing "Program" and "Developer")	Google (Cramer Decl. ¶ 6)	
Ex. B to Zaken Declaration [Dkt. No. 365-06] (L. Koh Dep. Tr.)	Page 188, lines 5-11 (from "at the end of the day," to end of sentence)	Google (Cramer Decl. ¶ 7)	
Ex. B to Zaken Declaration [Dkt. No. 365-06] (L. Koh Dep. Tr.)	Page 188, line 24 to page 189, line 2 (from "THE WITNESS," to end of sentence)	Google (Cramer Decl. ¶ 8)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 127, lines 11-12 (between "targeted to" and "developers")	Google (Cramer Decl. ¶ 9)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 127, lines 14-18 (from "the idea that Google had was" to end of sentence)	Google (Cramer Decl. ¶ 10)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 127, line 24, to page 128, line 2 (from "Hug arrangement" to end of sentence)	Google (Cramer Decl. ¶ 11)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 128, lines 14-18 (from "Q And" to end of sentence ending at line 18)	Google (Cramer Decl. ¶ 12)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 128, lines 4-13 (from "Q" to end of sentence ending at line 13)	Google (Cramer Decl. ¶ 13)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 128, lines 19-24 (from "Q" to end of sentence ending at line 24)	Google (Cramer Decl. ¶ 14)	

Item	Portion Containing Designated Information	Designating Party	Ruling
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 128, line 25 to page 129, line 1 (from “Q” to end of sentence ending at line 1)	Google (Cramer Decl. ¶ 15)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 129, lines 2-12 (from “Q” to end of sentence ending at line 12)	Google (Cramer Decl. ¶ 16)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 129, lines 13-25 (from “Q” to end of sentence ending at line 25)	Google (Cramer Decl. ¶ 17)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 130, lines 1-3 (between “more in” and “that I can recall.”)	Google (Cramer Decl. ¶ 18)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 130, lines 6-8 (between “other than” and “are there any”; and between “of the” and “Hug negotiations”)	Google (Cramer Decl. ¶ 19)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 130, lines 12-19 (between “I guess” and “Hug developers, did”; between “the other” and “Hug developers were”; and from “thinking about” to end of sentence)	Google (Cramer Decl. ¶ 20)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 130, line 20 to page 131, line 3 (between “A” and end of sentence on line 3)	Google (Cramer Decl. ¶ 21)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 131, lines 4-13 (from “A” to end of sentence on line 13)	Google (Cramer Decl. ¶ 22)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 131, lines 14-18 (from “A” to end of sentence on line 18)	Google (Cramer Decl. ¶ 23)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 131, line 23 to line 132, line 3 (from “A” to end of sentence on line 3)	Google (Cramer Decl. ¶ 24)	

Item	Portion Containing Designated Information	Designating Party	Ruling
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 132, lines 8-10 (from “THE WITNESS:” to end of sentence on line 10)	Google (Cramer Decl. ¶ 25)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 132, lines 18-21 (from “A” to end of sentence on line 21)	Google (Cramer Decl. ¶ 26)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 132, lines 22-25 (from “Q” to end of sentence on line 25)	Google (Cramer Decl. ¶ 27)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 133, lines 1-2 (from “A” to end of sentence on line 2)	Google (Cramer Decl. ¶ 28)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 133, lines 3-8 (from “Q” to end of sentence on line 8)	Google (Cramer Decl. ¶ 29)	
Ex. C to Zaken Declaration [Dkt. No. 365-06] (P. Kochikar Dep. Tr.)	Page 133, lines 10-13 (between “communications with” and “-- or without”)	Google (Cramer Decl. ¶ 30)	

Dated: _____, 2022

Honorable James Donato
United States District Judge
Northern District of California